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US Environmental Protection Agency  
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**Re: DCOI MUP, EPA Reg. No. 3008-134  
PRIA amendment to add alternate source**

Enclosed is an application to amend DCOI MUP, EPA Reg. No. 3008-134, for the three (3) reasons described below. The PRIA Action code for this submission is A570, with a fee of \$4,225.

1. Add an alternate source with supporting data represented in Alternate CSF #1. The enclosed preliminary analysis (MRID 52097801) of this source shows an average purity slightly greater than 100% at 100.16%. The certified limit range on the amended Basic CSF is 94.5% - 100.0%. Therefore, we request that this material be accepted as an alternate source.
2. Add an alternate source represented in Alternate CSF #2. This alternate source #2 has an EPA registration. Its DCOIT purity falls within the certified limits of our registration. Therefore, we request that this material be accepted as an alternate source.
3. Revise the Basic CSF to list a wider than standard lower certified limit. A lower limit of 94.5% is requested, which is 4% from 98.5%, just lightly more than the standard 3%. We request this wider range to allow for batch-to-batch variability expected during manufacturing and to incorporate the level found in the Accelerated Storage Stability and Corrosion Characteristics study (MRID 51560203). In this study, the average purity of two analyses was 94.58%. However, in discussing the test results with the lab and manufacturer, it was determined that when heated above 40-44°C, DCOIT becomes a liquid. Then if the sample cools quickly after removal from the heating chamber, crystals may form. These crystals contain higher concentrations of DCOIT. Therefore, if the sample pulled for testing did not include the crystals, the results are lower in purity and not representative of the entire product. The first result was 93.24%. When the GLP lab re-tested the samples they got 95.82% purity. The average concentration of those two purities is 94.58%. To account for the 94.58% result, we request a wider lower limit of 94.5% instead of the standard 95.5%.

Please find the following documents to support this application:

1. Application, form 8570-1;
2. Basic CSF and Alternate CSFs # 1 and 2, form 8570-4, dated 2/9/2023;
3. Certification with Respect to Citations of Data, form 8570-34;
4. EPA and Public versions of the Data Matrix, form 8570-35;
5. Summary of the Physical/Chemical Properties, form 8570-36;
6. Self-certification Statement for the Physical/Chemical Properties, form 8570-37;
7. Receipt for online PRIA payment of \$4,225; and
8. A copy of the following product chemistry studies to support Alternate CSF #1.

<b>MRID Number</b>	<b>Guidelines</b>	<b>Study</b>
<b>52097801</b>	830.1700, 830.1800	Zehr, P. (2023) DCOIT: Preliminary Analysis. Study number 59763. Unpublished study by Product Safety Labs. 36 p. with Confidential Attachment.
<b>52097802</b>	830.6317, 830.6320	Zehr, P. (2023) DCOIT: Accelerated Storage Stability and Corrosion Characteristics. Study number 59764. Unpublished study by Product Safety Labs. 23 p.
<b>52097803</b>	830.1550, 830.1600, 830.1620, 830.1670, 830.1750, 830.1900	Richardson, L.A. (2023) DCOI MUP Alternate Source Product Chemistry Group A. Unpublished study by Koppers Performance Chemicals. 15 p. with Confidential Attachment.

If you have any questions regarding this submission, please contact me. I may be reached by phone at 770-233-4244 or by email at RichardsonLA@Koppers.com.

Sincerely,



Leigh Ann Richardson  
Sr. Manager Regulatory Affairs